

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

In the Matter of)	
)	
Expanding Flexible Use in Mid-Band Spectrum)	GN Docket No. 17-183
Between 3.7 and 24 GHz)	

REPLY COMMENTS OF TELESAT CANADA

TELESAT CANADA

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November 15, 2017

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This reply is submitted by Telesat Canada (“Telesat”) in response to comments filed in this proceeding in relation to the potential for increased terrestrial use of the 3700-4200 MHz spectrum band.

C-band spectrum, including the 3700-4200 MHz fixed satellite service (FSS) band, is widely used. Telesat alone currently operates three satellites with full CONUS coverage using downlinks in 3700-4200 MHz band. C-band satellite downlinks support vital services to businesses and consumers in the U.S. These services include the delivery of video and audio programming throughout the country, the provision of maritime and aeronautical communications, connectivity in remote areas, public safety services, and communications during natural disasters and emergencies when terrestrial networks are damaged or out of service. C-band frequencies are particularly useful during extreme weather, due to their resistance to rain fade and broad coverage areas.

Satellite operators and their customers have invested billions of dollars in the infrastructure used to provide and receive these services. Changes in allocation of the 3700-4200 MHz band must not jeopardize critical satellite services and connectivity for American consumers and businesses.

Telesat also is cognizant, however, of the Commission's objective of making additional spectrum available for terrestrial 5G services and is aware of the joint proposal submitted by Intelsat License LLC and Intel Corporation in this proceeding. This proposal identifies a possible market-based mechanism for enabling terrestrial 5G use of C-band frequencies.

The Intelsat-Intel proposal raises a number of complex technical and business issues that need to be assessed, which Telesat is now doing. Once it has completed that assessment, Telesat may comment further on the Intelsat-Intel proposal.

Respectfully submitted,

TELESAT CANADA

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